## Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

In the Matter of	)
	)
Federal Communications Commission	)
Strategic Plan	)

To: The Commission

## COMMENTS OF TELECOMMUNICATIONS FOR THE DEAF, INC.

Telecommunications for the Deaf, Inc. ("TDI") hereby submits its comments on the draft Strategic Plan of the Federal Communications Commission ("FCC" or "Commission"). By Public Notice released on July 5, 2005, the Commission asked for public comment.

TDI is a national advocacy organization that seeks to promote equal access in telecommunications and media for the 28 million Americans who are deaf, hard-of-hearing, late-deafened, and deaf-blind so that they may attain the opportunities and benefits of the telecommunications revolution to which they are entitled. TDI believes that only by ensuring equal access for all Americans will society benefit from the myriad skills and talents of persons with disabilities.

In its draft Strategic Plan, the Commission established six general goals for the next five years in the areas of broadband, competition, spectrum, media, public safety and homeland security, and modernizing the FCC. However, in the 23 pages of discussion, there was only one reference to access to telecommunications, information services and media by people with disabilities – in the broadband discussion the Commission included in its objectives encouraging and promoting broadband deployment to persons with disabilities. Although this is a worthy

objective, TDI strongly suggests that the Commission measure up to its long history of commitment to people with disabilities as shown on the Commission's home page of its web site, where the FCC proudly displays activities in celebration of the fifteenth anniversary of the Americans with Disabilities Act ("ADA").

There are 54 million Americans with disabilities, and the Commission's strategic plan ought to recognize their prominence by establishing a seventh goal, namely, to foster and encourage access to telecommunications, information services and media by all Americans, including those who are deaf and hard of hearing. Within this broad goal, TDI proposes the following specific objectives:

- Broadening the contribution base of the Telecommunications Relay Service Fund ("TRS Fund") and Universal Service Fund ("USF") to include all local and long distance services, whether they be telecommunications or information services, and whatever the technology or protocol used to provide the services, including wireless and Internet protocols.
- Continuing support toward making Video Relay Service ("VRS") and Internet Protocol Relay ("IP-Relay") service mandatory and supported by a permanent viable funding mechanism at both federal and state levels. Because both services are delivered through use of the Internet, local and long distance service are currently indistinguishable. However, discussion is underway to classify local and long distance calls as such, and thus these calls ought to be supported at both federal and state levels from broadened contribution bases.

• Ensuring that broadband services are offered to all Americans, including those who are

deaf and hard of hearing, with technology-neutral accessibility, regardless of where the

consumer is located.

• Ensuring access by people who are deaf and hard of hearing to information services

without regard to the technology used for transmission or delivery.

• Offering opportunities for full participation on advisory committees as well as

employment opportunities at the Commission to people who are deaf and hard of hearing.

• Providing incentives and compliance audits for the telecommunications, information

service, and media industries to ensure that their products and services are accessible to

people with disabilities, including those who are deaf and hard of hearing.

TDI is concerned that people who are deaf and hard of hearing may be left behind as new

services and technologies are deployed. Including access to telecommunications, information

services and media by people with disabilities is a critical goal that ought to be adopted by the

Commission.

Respectfully submitted,

/S/

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